

Remarks

Applicants thank the Examiner for his careful consideration of this application.

Reconsideration of this application is now respectfully requested in view of the amendments above and the following remarks.

Claims 1-33 are now pending in the application, with Claims 1, 27, 29, and 30 being the independent claims. Claims 1, 21, 27, and 29 have been amended. New Claims 30-33 have been added.

Claim 21 has been amended to address a formal issue discussed during the Interview of January 26, 2006. It is respectfully submitted that this amendment merely addresses a formal matter and does not broaden the scope of the claim.

Claims 1, 21, and 29 have been amended to specify that a camera-motion layer is "a layer that appears to move with the camera as the camera moves." This is supported in the specification, e.g., at paragraph [0036].

New Claims 30-33 are method claims having material, some of which finds support in the claims as originally filed, and some of which finds support at least at paragraphs [0036]-[0041] of the specification.

At Pages 4-5, the Office Action rejects Claims 1, 2, 22, 25-27, and 29 under 35 U.S.C. § 103(a) as being anticipated by Maeda (U.S. Patent No. 6,625,316). At Pages 5-6, the Office Action rejects Claims 3-5 and 23 under 35 U.S.C. § 103(a) as being unpatentable over Maeda in view of Jasinski et al. (U.S. Patent No. 6,504,569). At Pages 6-7, the Office Action rejects Claims 6, 13, and 15 under 35 U.S.C. § 103(a) as being unpatentable over Maeda in view of

Foreman et al. (U.S. Patent No. 6,628,303). At Pages 7-9, the Office Action rejects Claims 7-12, 14, 16-21, 24, and 28 under 35 U.S.C. § 103(a) as being unpatentable over Maeda in view of Petelycky et al. (U.S. Patent No. 6,204,840). Applicants respectfully traverse these rejections for the following reasons.

First, each of Claims 1, 27, and 29, as amended, recites the editing of a *camera-motion layer*, which is "a layer that appears to move with the camera as the camera moves." Neither Maeda nor any of the other cited prior art discusses the editing of a camera-motion layer. In particular, the Advisory Action and the Office Action assert that Maeda, at col. 13, lines 15-28 and col. 19, lines 32-35, discloses editing a camera-motion layer. However, Applicants argue that this is not the case. In particular, none of the content being addressed in these passages, or anywhere else in Maeda, "appears to move with the camera as the camera moves." For example, the yacht and the battleship described at col. 19, lines 32-35 do not "appear to move with the camera as the camera moves." On the contrary, these are objects that move independently of how the camera moves.

As an example of a camera-motion layer (to which this is not to be limited), suppose that a camera is panned from left to right. In that case, some elements may appear to move from right to left as the camera is panned from left to right, even though they are not actually moving in this fashion. A layer containing such elements may be considered to be a camera-motion layer. Similarly, if a camera is tilted to the right, some elements may appear to tilt/rotate left. If the camera is zoomed in, some elements may appear as if they are moving toward the camera (i.e., outward). All of these are examples of phenomena that may occur in various types of

camera-motion layers. As noted above, the cited portions of Maeda have nothing to do with such camera-motion layers.

For at least this reason, therefore, Claims 1, 27, and 29, as well as their dependent claims, are allowable over the cited prior art.

Second, each of Claims 1, 27, and 29 recites that a modified composite video sequence is obtained *without editing each frame of the original video sequence*. As shown, e.g., in Fig. 2 (see, e.g., reference numerals S103, S104, S112), Fig. 6 (see, e.g., reference numerals S120, S121, S125), col. 15, lines 16-20, and col. 17, lines 41-45 of Maeda, the method used in Maeda edits each frame of the video sequence. Figures 8, 14-17, col. 15, lines 10-20 and 34-36, and col. 16, lines 24-35, cited in the Advisory Action, are also consistent with the figures and passages cited in the Office Action in that, they, too, show editing of each frame of the video sequence. In particular, these passages cite the extraction of foreground objects and applying modifiers to individual objects *in individual frames of the video sequence*, as noted, e.g., at col. 15, line 13 and at col. 17, line 33 ("encoded in units of frames"); it is further noted that col. 17, lines 41-45 discuss how the processing of a still image is equivalent to the processing of a single frame of video, to show that the frame-based techniques of Maeda are also applicable to still images. Hence, ***Maeda does not teach that a modified composite video sequence is obtained without editing each frame of the original video sequence.*** Furthermore, Applicants have not found any applicable teaching or suggestion in any of the other cited references. For this additional reason, it is further submitted that Claims 1, 27, and 29, as well as their dependent claims, are allowable over the cited prior art.

For at least these reasons, therefore, it is respectfully submitted that Claims 1-29 are allowable over the cited prior art. Applicants respectfully request withdrawal of the above-mentioned rejections.

There are additional reasons for which various dependent claims are respectfully submitted to be allowable over the cited prior art, examples of which were noted in Applicants' previous Amendment and Reply filed on December 27, 2004. These arguments will not be repeated here in detail; however, Applicants maintain that none of them are contradicted by the Office Action's discussion at pages 2-4. For example, no part of this discussion addresses any of the arguments relating specifically to camera-motion layers (see above). Furthermore, at no point in this discussion does the Office Action address the question of Fig. 3F of Petelycky et al. being directed to audio effects, rather than video effects (and it is further noted that the Office Action at page 8 continues to rely on this).

While Applicants do not necessarily concur with the Office Action's characterizations of the claims and/or the references with regard to other claimed features, Applicants choose not to discuss each such feature. Consequently, the lack of explicit discussion is not to be understood as indicating tacit agreement with such characterizations.

New Claims 30-33 are method claims, where Claims 31-33 depend from Claim 30. Claim 30 contains both of the distinguishing features discussed in detail above in connection with Claims 1, 27, and 29, and thus is allowable, along with Claims 31-33, for at least the same reasons. Claim 30 also recites that the claimed editing comprises "editing at least one camera motion parameter of one of said original camera-motion layer to obtain a set of modified camera

motion parameters, said camera motion parameters dictating camera movement with respect to the one or more camera-motion layers." It is respectfully submitted that the cited prior art does not address the modification of camera motion parameters that dictate camera movement with respect to a camera-motion layer. It is respectfully submitted that this provides an additional reason for the allowability of Claims 30-33.

Conclusion

All of the stated grounds of objection and rejection have been properly traversed, accommodated, or rendered moot. Applicants, therefore, respectfully request that the Examiner reconsider all presently outstanding objections and rejections and that they be withdrawn. Applicants believe that a full and complete reply has been made to the outstanding Office Action and, as such, the present application is in condition for allowance. If the Examiner believes, for any reason, that personal communication will expedite prosecution of this application, the Examiner is hereby invited to telephone the undersigned at the number provided.

Prompt and favorable consideration of this Amendment and Reply is respectfully requested.

Respectfully submitted,

Date: May 4, 2006

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